

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, SOUTHEASTERN DIVISION

Christopher B. v. Frank J. Bisignano, Commissioner of Social
Security Administration

Christopher B. · No. No. 1:25 CV 64 JMB · Decided February 10, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri reviewed an Administrative Law Judge’s denial of Christopher B.’s application for Social Security disability insurance benefits. The court held that the ALJ’s assessment of medical opinions and residual functional capacity, including limitations on handling, fingering, and feeling, was supported by substantial evidence. The court affirmed the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Southeastern Division
WRITING FOR THE COURT	John M. Bodenhausen
JURISDICTION	United States District Court for the Eastern District of Missouri, Southeastern Division
DECIDED	February 10, 2026
DOCKET	No. 1:25 CV 64 JMB
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's denial of disability insurance benefits.
STANDARD OF REVIEW	The court reviewed whether the ALJ's findings were supported by substantial evidence in the record as a whole, considering evidence both supporting and detracting from the decision, and deferred to the ALJ so long as the decision remained within the permissible zone of choice.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; persuasive only
PARTIES	Christopher B. v. Frank J. Bisignano, Commissioner of Social Security Administration

TOPICS

judicial review of agency action

administrative law

exhaustion of remedies

disability definition

ada / disability

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the supportability and consistency of the medical opinions of Drs. Dennis McGraw and Charity Sandvos.
2. Whether the ALJ's residual functional capacity finding, including the limitation to frequent handling, fingering, and feeling, was supported by substantial evidence.
3. Whether the ALJ's erroneous statement that both agency examiners found manipulative limitations required remand.

HOLDINGS

1. The ALJ properly evaluated the persuasiveness of the opinions of Drs. McGraw and Sandvos by addressing their supportability and consistency, as required by 20 C.F.R. § 404.1520c.
2. The ALJ's finding that Plaintiff could perform sedentary work with frequent handling, fingering, and feeling was supported by substantial evidence.
3. The ALJ's mistaken statement that both Dr. McGraw and Dr. Sandvos found manipulative limitations was harmless error.
4. The Commissioner's decision must be affirmed when the ALJ's findings are supported by substantial evidence on the record as a whole and fall within the permissible zone of choice.

KEY QUOTATIONS

“The Court’s role on judicial review is to determine whether the ALJ’s finding are supported by substantial evidence in the record as a whole.” (Discussion, Part I)

“This error is merely an error of opinion writing and is harmless.” (Discussion, Part II.A)

“For the foregoing reasons, the Court finds that the ALJ’s determination is supported by substantial evidence on the record as a whole.” (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning December 4, 2021, based primarily on diabetes and amputations of his fourth and fifth toes. Agency medical reviewers opined that he could perform light work with limitations, including frequent handling, fingering, and feeling, while the ALJ adopted a more restrictive sedentary residual functional capacity and prohibited climbing ladders, ropes, or scaffolds. The ALJ also considered Plaintiff's

activities of daily living, normal or relatively mild upper-extremity findings, treatment for neuropathy and carpal tunnel syndrome, and his use of video games in evaluating the alleged manipulative limitations.

PROCEDURAL HISTORY

Christopher B. applied for disability insurance benefits alleging disability from diabetes and toe amputations. The claim was denied through the administrative process, and an Administrative Law Judge issued an adverse decision on April 11, 2024. After exhausting administrative remedies, Plaintiff sought review in the district court, arguing that the ALJ improperly evaluated medical opinions and assessed his residual functional capacity, particularly his ability to handle, finger, and feel. The court affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Baker v. Secretary of Health & Human Services, 955 F.2d 552, 555 (8th Cir. 1992)
- Pearsall v. Massanari, 274 F.3d 1211, 1217 (8th Cir. 2001)
- Bowen v. Yuckert, 482 U.S. 137, 140-42 (1987)
- Moore v. Astrue, 572 F.3d 520, 523 (8th Cir. 2009)
- Pate-Fires v. Astrue, 564 F.3d 935, 942 (8th Cir. 2009)
- Dukes v. Barnhart, 436 F.3d 923, 928 (8th Cir. 2006)
- Vandenboom v. Barnhart, 421 F.3d 745, 750 (8th Cir. 2005)
- Banks v. Massanari, 258 F.3d 820, 824 (8th Cir. 2001)
- Ross v. O'Malley, 92 F.4th 775, 778 (8th Cir. 2024)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Juszczuk v. Astrue, 542 F.3d 626, 631 (8th Cir. 2008)
- Wildman v. Astrue, 964 F.3d 959, 965 (8th Cir. 2010)
- Cox v. Astrue, 495 F.3d 614, 617 (8th Cir. 2007)
- Hurd v. Astrue, 621 F.3d 734, 738 (8th Cir. 2010)
- Howard v. Massanari, 255 F.3d 577, 581 (8th Cir. 2001)
- Beckley v. Apfel, 152 F.3d 1056, 1059 (8th Cir. 1998)
- Stewart v. Secretary of Health & Human Services, 957 F.2d 581, 585-86 (8th Cir. 1992)
- Buckner v. Astrue, 646 F.3d 549, 556 (8th Cir. 2011)
- McNamara v. Astrue, 590 F.3d 607, 610 (8th Cir. 2010)
- Starman v. Kijakazi, 2021 WL 4459720, at *4 (E.D. Mo. Sept. 29, 2021)
- Austin v. Kijakazi, 52 F.4th 723, 729 (8th Cir. 2022)
- Black v. Apfel, 143 F.3d 383, 386 (8th Cir. 1998)
- Cropper v. Dudek, 136 F.4th 809, 815 (8th Cir. 2025)

- Schmitt v. Kijakazi, 27 F.4th 1353, 1360 (8th Cir. 2022)
- Papesh v. Colvin, 786 F.3d 1126, 1131 (8th Cir. 2015)
- Halverson v. Astrue, 600 F.3d 922, 931 (8th Cir. 2010)
- Polaski v. Heckler, 739 F.2d 1320, 1322 (8th Cir. 1984)
- Vick v. Saul, No. 1:19 CV 232 CDP, 2021 WL 663105, at *8 (E.D. Mo. Feb. 19, 2021)
- Renstrom v. Astrue, 680 F.3d 1057, 1066 (8th Cir. 2012)
- Grba-Craghead v. Astrue, 669 F. Supp. 2d 991, 1008 (E.D. Mo. 2009)
- Nash v. Commissioner, Social Security Administration, 907 F.3d 1086, 1090 (8th Cir. 2018)
- Julin v. Colvin, 826 F.3d 1082, 1086 (8th Cir. 2016)
- Eichelberger v. Barnhart, 390 F.3d 584, 591 (8th Cir. 2004)
- Gentry v. Kijakazi, 2021 WL 3288531 (8th Cir. 2021)
- Hollis v. Saul, 2020 WL 4120467 (E.D. Mo. 2020)
- Sanders v. Saul, 2021 WL 3027270 (E.D. Mo. 2021)
- Nelson v. Kijakazi, 2021 WL 5035671 (E.D. Mo. 2021)
- Reinhafer v. Colvin, 2014 WL 2967922 (E.D. Mo. 2014)
- Anderson v. Shalala, 51 F.3d 777, 779 (8th Cir. 1995)